

# Morgan Lewis

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July 21, 2021

**VIA ECF**

Honorable Denise L. Cote

U.S. District Court for the Southern District of New York

500 Pearl St.

New York, NY 10007

Re: *BCBSM, Inc. v. Vyera Pharmaceuticals, LLC*, No. 1:21-cv-01884-DLC

Dear Judge Cote:

In accordance with Rule 8.B of Your Honor's Individual Practices in Civil Cases and the requirements for electronic filing under seal, Defendants Vyera Pharmaceuticals, LLC and Phoenixus AG (together, "Vyera") respectfully request permission to file a version of Exhibits A and C to their forthcoming letter regarding Plaintiff BCBSM, Inc.'s discovery requests under seal (the "Exhibits"). The Exhibits contain trade secret, commercially-sensitive information that falls within the scope of "Confidential Information," as that term is defined in Section 2(a) of the Stipulated Protective Order. *See* ECF No. 53.

As required by Rule 8.B of Your Honor's Individual Practices in Civil Cases and the requirements for electronic filing under seal, Vyera will publicly file a version of the Exhibits with the proposed redactions. As further required, in a separate docket entry, Vyera will file under seal a version of the Exhibits with the proposed redactions highlighted.

Thank you for your consideration of our request.

Respectfully submitted,

Stacey Anne Mahoney

CC: All counsel of record

The proposed redactions are approved. 7.26.2021.



DENISE COTE

United States District Judge

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